David E.S. Commins (CSBN 124205) Kenneth C. Wobster (CSBN 179058) 1 2 COMMINS & WEBSTER, P.C. 400 Montgomery Street, Suite 200 San Francisco, CA 94104 3 Tel (415) 391-6490 Fax (415) 391-6493 david@commins.com 5 ken@commins.com 6 Attorneys for Plaintiff Shoreline Capital Management, Ltd. 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN JOSE DIVISION 11 12 SHORELINE CAPITAL MANAGEMENT, LTD., a British Virgin Islands company 13 limited by shares, No. JW CV 08 0121 14 Plaintiff. DECLARATION OF WEI WANG SUPPORTING EX PARTE APPLICATION 15 FOR TRO AND OSC RE PRELIMINARY V\$. INJUNCTION, AND FOR ORDER GRANTING LEAVE TO CONDUCT 16 XIAOBING SUN, an individual, also known as DANIEL SUN, **EXPEDITED DISCOVERY** 17 18 Defendant. 19 20 21 I, Wei Wang, say: 22 I am an employee of Guangzhou United (GU), the onshore 23 agent of Shoreline Capital Consulting (Shenzhen) Co., Ltd. (Shoreline Shenzhen), the wholly-owned subsidiary of Shoreline Capital Management, Ltd. (Shoreline) that is 24 the Plaintiff in this action. GU's agency contract with Shoreline Shenzhen is for the 25 sole purpose of employing Shoreline personnel and it is 100% funded by 26 Shoreline. I have personal knowledge of the matters set forth in this Declaration and would competently testify to them if called as a witness. 27 28 DECLARATION OF WEI WANG SUPPORTING EXPARTE APPLICATION FOR TRO

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I joined Guangzhou United in September 2007, and I am still employed at Guangzhou United During my employment with Guangzhou United, my job has been and is to service distressed assets, the primary investment of the firm.

- Upon the commencement of my employment atGuangzhou United in September 2007, Shoreline Shenzhen and Shoreline delivered to me the Shoreline Employee Handbook, which, to my knowledge, is delivered to all employees on their date of hire. It explicitly explained that use or disclosure of its financial analysis models, Excel work sheets and other relevant documents outside of Shoreline is strictly prohibited.
- From September to the present, I have realized that the Excel financial model used to evaluate the firm's distressed asset portfolios in China is the most important asset/tool of Shoreline Capital. It is my observation that Shoreline's partners and managers use every possible means to protect the financial model, the intellectual property contained therein. and require anyone that has used or looked at the model to sign a confidentiality agreement.
- 5. From September to the present, I have observed that Shoreline strictly guards as confidential all lists and information related to any potential investment deal from any asset management company, bank, or other source.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this lottday of January, 2008 at Guangaben . Chint

DECLARATION OF WEI WANG SUPPORTING EXPARTE APPLICATION FOR TRO AND OSC RE PRELIMINARY INJUNCTION, AND FOR ORDER GRANTING LEAVE TO CONDUCT EXPEDITED DISCOVERY